

A photograph of the Tennessee State Capitol building, a large neoclassical structure with a prominent dome and columns, set against a clear blue sky. The building is illuminated by warm sunlight, suggesting late afternoon or early morning. A small flag is visible on top of the dome.The logo consists of the letters "TN" in white, bold, sans-serif font, set against a red square background.

Department of  
**Labor & Workforce  
Development**

# SNAP Employment and Training State Plan

Federal Fiscal Year 2016



# Table of Contents

Table of Contents.....	2
Part I.....	5
A. Tennessee’s SNAP E&T Program .....	5
1. Program Changes.....	7
2. ABAWD Population.....	9
3. Additional allocation for “Pledge” States .....	9
4. Program Components.....	9
5. Sequencing of Components .....	10
6. Other Employment Programs .....	10
7. Workforce Development System.....	11
8. Outcome Data.....	14
B. Program Components.....	15
Component Costs: .....	18
1. Adult Education (AE) (Non-Work Component) .....	18
2. Workforce Innovation and Opportunity Act (Youth Services) Non-Work.....	20
3. Workforce Innovation and Opportunity Act (Adult/ Dislocated Worker) .....	21
Non-work .....	21
4. Self- Initiated Work Experience/IES (Work Component).....	22
Total Program Costs:.....	23
PROGRAM PARTICIPATION.....	24
PART II.....	27
PROGRAM PARTICIPATION AND EXEMPTIONS.....	27
A. Work Registrant Population.....	27
1. Number of Work Registrants (as determined by TDHS).....	27
2. Unduplicated Work Registrant Count .....	27
3. Characteristics of Work Registrants .....	27

B. Exemption Policy .....	28
C. Work Registrants Exempt from SNAP E&T Individual / Personal Exemptions .....	28
D. Planned E&T Program Participation .....	28
E. ABAWD Information.....	28
PART III.....	29
PROGRAM COORDINATION .....	29
A. Program Coordination .....	29
1. Narrative Coordination Statements .....	29
2. Information Coordination.....	29
3. Coordination Time Frames .....	30
B. Interagency Coordination .....	31
1. Areas of Coordination .....	31
2. Methods of Coordination.....	31
C. Contractual Agreements .....	31
PART IV.....	32
PROGRAM TDLWD COSTS AND FINANCIAL MANAGEMENT .....	32
A. Planned Costs of the State SNAP E&T Program .....	32
1. Operating Budget .....	32
2. Sources of SNAP E&T Funds .....	32
B.Contracts .....	32
C.Participant Reimbursement .....	32
1. Method of Reimbursement .....	32
2. Procedure for Reimbursement .....	32
D.Cost Allocation .....	32
PART V.....	33
PROGRAM REPORTING AND MANAGEMENT INFORMATION .....	33
A. Method for Obtaining Initial Count of Work Registrants .....	33
B. Method for Ensuring an Unduplicated Work Registrant Count .....	33
C. Methods for Meeting On-Going Federal Reporting Requirements .....	33
SNAP EXPENDITURES AND COST ALLOCATION .....	35
TABLES.....	36

Staffing Table: .....	37
TABLE 1: .....	38
TABLE 2 .....	38
TABLE 3 .....	39
TABLE 4 .....	41
TABLE 5 .....	42
APPENDIX A: TDLWD FFY 2015 Service Map.....	43
APPENDIX B: WIOA Youth services description.....	44
Appendix C: CBPP Maps.....	47
Appendix D: LWDA ABAWD counts.....	49
Appendix E: Indirect cost rate.....	50

# Part I

## A. Tennessee's SNAP E&T Program

The Tennessee Department of Labor and Workforce Development (TDLWD) is the direct grantee of Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Funds. Although TDLWD is the administrative entity, the program is operated as a partnership between the Tennessee Department of Human Services (TDHS) and TDLWD. TDHS makes the eligibility determination for SNAP benefits and refers Participants through an automated interface. Communication is maintained throughout each individual's participation to ensure their status is accurately tracked by both departments.

Participants are required to observe a Program Orientation that explain the work requirements, components offered, component requirements, and assistance provided for each component. We hope to implement an Online Orientation during Fiscal Year 2016. After the Orientation has been completed, program Participants are assessed during a one on one meeting to develop an Individual Employment Plan (IEP). The assessment will review the individual's background, education, work history, hobbies, and any barriers to employment. The plan can include education and/or training activities, but the overall goal is obtaining employment with a gainful wage that significantly reduces or eliminates the need for governmental assistance. After the IEP is developed, Participants will immediately begin their participation in their most suitable component.

Tennessee's Department of Labor and Workforce Development has a number of divisions and programs that provide a vast array of services that combine to support jobs and workforce development in Tennessee. The Workforce Services Division is responsible for delivering the Department's employment and educational services to employers and job seekers in local American Job Centers (AJC), partner agencies, and online at [www.jobs4tn.gov](http://www.jobs4tn.gov). SNAP E&T is fully integrated within that structure offering all training and educational opportunities to SNAP E&T participants. The AJC Workforce Services structure also allows the leverage of Non-Federal funds of Partner Programs/Agencies to create 50/50 partnerships to expand services and move more SNAP E&T participants to self-sufficiency, which we hope to explore more during Fiscal Year 2016.

The Governor of Tennessee, Bill Haslam, has challenged our state with a "Drive to 55" mission for Tennessee's future workforce and economic development. The drive is to get 55% of Tennesseans equipped with a college degree or certificate by the year 2025.

The Drive to 55 offers the following 3 initiatives:

- TN Promise offers two years of tuition-free community or technical college to Tennessee's graduating high school seniors.
- TN Reconnect helps adults who failed to complete their post-secondary degree re-engage at any Tennessee College of Applied Technology with no tuition or fees.
- TN Leap ensures post-secondary institutions provide skills and credentials that Employers really need, thereby filling skill gaps across the state.

SNAP E&T will utilize the TN Reconnect initiative to assist adults with their training needs. Reconnect will cover tuition/ fees, so there is no cost to the program, other than supportive services. We plan to explore Reconnect as a potential Third Party Partnership during this Fiscal year.

Federal Fiscal Year 2015 was a transition year for Tennessee's SNAP E&T Program. New staff was hired, an automated referral process was implemented, and reviews were completed in all TDLWD offices to identify deficiencies and address them in all offices. Training and technical visits were completed to ensure the new vision of the program was clearly relayed and understood by all staff assigned to the program. We feel a solid foundation has been established and we are ready to take full advantage of being integrated within Tennessee's workforce system and begin pursuing Third Party Partnership opportunities.

There are currently no Tribal Organizations in the state of Tennessee, so there are no specific plans for this population at this time.

## 1. Program Changes

The SNAP E&T Program expanded during FFY 2015 to offer services in a total of 13 of Tennessee's 95 most populated counties. The expansion allowed SNAP E&T services to be offered in a Comprehensive America's Job Center (AJC) in each Local Workforce Development Area (LWDA), providing training and educational opportunities to over half of Tennessee's Mandatory Work Registrants and created the flexibility to expand to any county within the LWDA to accommodate the needs of the ABAWD population we expect to serve in FFY 2016.

To accommodate the ABAWD population SNAP E&T will be offered as a Statewide Voluntary program for Regular E&T Participants and ABAWDs in the following 42 counties<sup>1</sup>:

Johnson	Anderson	Coffee	Putnam	Sumner	Hickman
Sullivan	Blount	Franklin	Smith	Williamson	Marshall
Washington	Cumberland	Lincoln	Cheatham	Davidson	Maury
Hamblen	Loudon	Moore	Dickson	Rutherford	Chester
Hawkins	Bradley	Warren	Humphreys	Trousdale	Madison
Sevier	Hamilton	Cannon	Montgomery	Wilson	Dyer
Knox	Sequatchie	Macon	Robertson	Giles	Shelby

These service counties for FFY 2016 allow TDLWD to offer a qualifying activities to 79% of the ABAWD population.

The Tennessee Department of Labor and Workforce Development hosted a workforce summit in May of 2015. Representatives from 22 Tennessee Colleges of Applied Technology (TCAT)<sup>2</sup> and 12 Community Colleges<sup>3</sup> within our FFY 2016 service area were in attendance. A SNAP E&T presentation was offered prompting several inquiries into how partnerships could be established. Short term training programs have been identified in each area. Each institution is expected to identify their sources of Non-Federal match funds. Once identified, MOU's will be established and forwarded to FNS for review. If approved, TDLWD will provide seed funds to each TCAT and Community College to cover tuition costs and hire a college case manager to identify SNAP participants, track E&T Participants compliance, inform interested students of the program requirements, update TDLWD's Virtual One Stop (VOS) computer system with each participants status on a monthly basis, and communicate with TDLWD case managers as needed.

---

<sup>1</sup> A map outlining the service counties within each LWDA is included as Appendix A.

<sup>2</sup> <https://www.tbr.edu/institutions/colleges-applied-technology>

<sup>3</sup> <https://www.tbr.edu/institutions/community-colleges>



TDLWD is requesting FNS' authorization to allow reverse referrals, so case managers on college campuses can refer students who were denied SNAP, due to failure to meet the student criteria, back to TDHS to determine their eligibility for SNAP benefits based on the determination that they would be eligible for SNAP E&T.

To ensure all SNAP E&T Participants in the 42 service areas have access to qualifying components, Career Specialist will become mobile and travel to surrounding counties within their Local Workforce Development Area (LWDA). Contact with each Participant will be required on a monthly basis. College Case Managers will be on campus to meet with Participants before or after class, also on a monthly basis.

WIOA legislation requires recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient be given priority of service for adult career and training services. This makes SNAP E&T participants a priority to all programs offered under WIOA youth and adult/dislocated workers. SNAP E&T Participants can take full advantage of this opportunity, since we are housed within the AJC with the WIOA as a partner. We plan to refer majority of Participants to WIOA for training programs. Our Partnership with TCAT's and Community Colleges will allow us to select several short term training programs to quickly train participants interested in attending school. WIOA can then move them to On-the-Job OJT opportunities that would not be available to Participants, outside of our partnership.

WIOA section 3(46) and 129(a)(1)(B) expands youth services to low income individuals to age 24 years old depending on their school status. We plan to partner with the WIOA Youth Services Division at the AJC to refer all Participants within their allowed age range for training and education services<sup>4</sup>. They also offer:

- Pre- Apprenticeship programs
- Internships and Job Shadowing
- On-the-Job training Opportunities

TDLWD plans to identify and partner with a Community Based Organization (CBO) in West, Middle, and East Tennessee during the 2016 FFY. CBO's could possibly provide Soft skills training, assist with case management functions, and provide specialized services. TDLWD will seek to amend the plan when those Organizations have been identified as well as their Non-federal match funding and an MOU is established.

We fully expect to amend this plan as MOU's are established with Training Institutions and CBO's, as their match funds will need to be allocated. Once established we will have the capacity to expand to additional areas/counties within Tennessee.

Tennessee plans to include SNAP E&T if a combined plan is submitted under WIOA.

---

<sup>4</sup> TDLWD youth services summary sheet is attached as Appendix B



## **2. ABAWD Population**

The expiration of the Statewide ABAWD Time limit Waiver will expire December 31, 2015. TDHS has elected to track the 3 in 36 participation time limits with a Fixed Clock beginning January 1, 2016 and ending December 31, 2018 for all SNAP Eligible individuals identified as an ABAWD.

TDHS reports indicate 102,264 Potential ABAWDs will be subject to the 3 in 36 time limit. The Center on Budget and Policy Priorities completed an ABAWD Waiver analysis<sup>5</sup> for the state of Tennessee. Although the report identified 82-86 counties that meet the waiver criteria, TDHS has elected not to waive any areas/counties within the state. TDLWD will begin Federal Fiscal Year (FFY) 2016 in 42 counties. TDLWD is notified when employers plan to expand within the state or are interested in operating in areas across Tennessee. Therefore, we will know when economic opportunities are available in the additional 53 counties during the 2016 FFY and will move into those areas at that time. Tennessee also has 42,990 15% exemptions. Therefore, we plan to provide qualifying activities to 59,274 at risk ABAWDs<sup>6</sup> that will be subject to the time limit effective January 1, 2016. That represents 79% of the ABAWD population.

TDHS will request to use their 42,990 15% ABAWD Exemptions for specific populations, i.e. homelessness, and will define these categories as more data becomes available.

## **3. Additional allocation for “Pledge” States**

Tennessee will not operate under a “pledge state” status for FFY 2016.

## **4. Program Components**

TDLWD will offer the following 4 Components during FFY 2016:

- Adult Education
- WIOA (Youth Services 16 -24)
- WIOA (Adults and Dislocated Workers)
- Self- Initiated Work Experience / Individual Employment Search (IES)

---

<sup>5</sup> The full CBPP report is attached as Appendix C

<sup>6</sup> ABAWD by LWDA is also listed on Appendix D

## **5. Sequencing of Components**

Participants will be advised of all component options at Orientation. Any Participant who has not attained their Diploma or a High school equivalency certificate will be required to enroll in the Adult Education component. Once they have passed the HiSET, they will be free to enroll in another component that best suits their employment goals. Other Participants may request to be placed in a different component. The request will only be approved if funds are available and if it's a qualifying component based on their participant type. If approved, the participant will be placed in the new component the first of the following month.

## **6. Other Employment Programs**

The SNAP E&T Program is not currently partnering with any other program to provide Employment services. TANF is a required partner under WIOA and will therefore become a part of the Workforce System in FFY 2016. However, there are no plans to operate a simplified mini program, so SNAP E&T funding will never be utilized on TANF Participants.

## 7. Workforce Development System

The Workforce Innovation and Opportunities Act state planning process provides an opportunity for states to align SNAP E&T with the broader workforce system to help SNAP participants build their skills and find family-supporting jobs. The Tennessee Workforce Development system has the following benefits:

- We are at the center of workforce development in Tennessee (approximately \$80 Million in federal funds is allocated to our Department each year)
- We work to connect employers looking for qualified workers (80,000 + job orders in jobs4tn at any given point)
- We work to connect job seekers with hiring employers (approximately 225,000 engage of services each year looking for employment and training opportunities)
- We prioritize our efforts based on demand occupations and serving people with barriers
- While we have to prioritize our efforts we serve all companies looking for workers and support potential labor pools in connecting with job opportunities
- Job orders run the gamut from entry level with no educational priority to high skilled specific disciplines
- Job applicants range from no Hi-SET/ GED to 16 years of education and beyond
- The framework for connectivity of job seekers and employers includes:
  - Jobs4TN
  - The American Job Centers (AJC) operated by a consortium of partners
  - Mobile Units
- Specific programs areas include:
  1. Wagner Peyser (Job Service/Labor exchange functions in 23 comprehensive centers)
  2. Workforce Innovation and Opportunity Act (13 Local Workforce Development Areas)
  3. Trade Adjustment Assistance (support workers affected due to off-shoring)
  4. Veterans Job Service Grants (veterans staff case managers serving disabled veterans/veterans and job development with Tennessee employers)
  5. Alien Labor Certification (includes Permanent Labor, H1B, H2B, H2A) (primary role is to partner with Homeland Security and Regional Offices)
  6. Migrant Seasonal Farmworker (housing inspections to ensure foreign workers have necessary supports while working and living in Tennessee)
  7. Senior Community Service Employment Programs (targets subsidized temporary employment for workers over age 55 and contract management)

8. Federal Bonding (work with federal office to offer bonding to at-risk workers that need to be bonded for employment)
  9. Work Opportunity Tax Credit (tax credits target Tennessee employers that hire identified at-risk workers)
  10. Supplemental Nutrition Assistance Program (SNAP) Employment and Training Component (Participants receiving a food stipend/food stamps are referred to our department to transition to employment)
  11. C-SPED – pilot initiative with DHS to identify non-custodial parents and support with barriers to employment
  12. Disability Employment Initiatives (grant administration)
  13. Worker Adjustment and Retraining Notification Act. We serve dislocated workers when a company closes, downsizes or changes processes that affect more than 50 workers in Tennessee or 100 based on the federal standard. We initiate a Rapid Response team to meet with company officials to support quick connection of affected workers to other hiring companies and unemployment insurance benefits.
- Initiatives that we are currently involved in:
    - a. Support the Governor’s recruitment and retention efforts through the Fast Track initiatives (On the Job Training contracts)
    - b. Incumbent Worker Training Grants (contracts to Tennessee employers to address lay-off aversion through targeted training)
    - c. Apprenticeship Assistance grants (increase registered apprentices in Tennessee)
    - d. Special Projects based on availability of funds (currently includes Return on Investment, two Offender projects working with County Jails, Economic Analysis in West Tennessee)
    - e. Pathways Tennessee (inter-departmental effort)
    - f. Workforce 360 (inter-departmental effort)
    - g. Governor’s Children Sub-Cabinet (inter-departmental effort)
    - h. Governor’s Workforce Sub-Cabinet (inter-departmental effort)
    - i. State Workforce Development Board (compliance requirements under WIOA). Requires partners within the AJC to include Vocational Rehabilitation, Adult Education and several programs already within the Workforce Services Division
  - Accountability is key when accepting federal funds. Performance outcomes are negotiated with the regional office.
  - Each program requires capturing data, reporting data and data validation
  - Sharing data is required to build efficiency and remove duplication of application process and document verification. Several data sharing MOU’s in place with other Tennessee State Agencies (i.e. P-20), interfaces (i.e. SNAP/WOTC) and numerous other states as it relates to wage data (i.e. Wage Records Interstate System (WRIS))
  - We are currently working with the following employers with the identified positions:

	Employer/Company	# of Positions
1	Under Armour	<b>1,200</b>
2	American Standard	<b>600</b>
3	Academy Sports Distribution	<b>700</b>
4	De-Sta-Co	<b>600</b>
5	Hankook Tire	<b>1,800</b>
6	Dal-Tile	<b>350</b>
7	Beretta	<b>500</b>
8	SureCan	<b>101</b>
9	Ryder Transportation	<b>600</b>
10	ServPro	<b>204</b>
11	Gestamp	<b>500</b>
12	UBS	<b>350</b>

## 8. Outcome Data

Outcome data will be captured by the VOS system. Participants will be monitored in each component to determine its effectiveness. The effectiveness of the Adult Education component will be based on the number of participants who enter the component versus those that pass the HiSET and receive a certificate. The effectiveness of WIOA will be based on the number of participants who receive certification and obtain employment based on that credential/license. TDLWD case managers generate a real time electronic status notice within VOS that can be sent instantly to TDHS.

- Clients who appeared or failed to appear for their Orientation appointment
- Clients who alleged they meet a federal or state exemption that prevents them from participating
- Clients who have completed the program requirements and need to be deregistered

TDLWD staff had the privilege to attend Washington State's BFET Annual training where USDA/FNS national office announced reporting measures will be required with the submission of the 2017 State SNAP E&T Plans. Although the exact outcomes to be measured have not been identified, we were advised they would be influenced by the common measures defined in WIOA like the number of Participants who have:

- Entered employment
- Retained employment
- Attained Earnings/wages
- Attained a Credential

TDLWD will complete system upgrades during FFY 2016 to ensure we can capture all outcome data required during 2017.

## B. Program Components

TDLWD has selected 4 Components for Program year 2016 including

1. Adult Education (Non Work)
2. WIOA (Youth Services 14 -24) (Non Work)
3. WIOA (Adults and Dislocated Workers) (Non Work)
4. Self- Initiated Work Experience / Individual Employment Search (IES) (Work)

### Projected Component Participation for FFY 16:

Adult Education: selected by **15%** of all participants

WIOA Youth Services: selected by **25%** of all participants

WIOA Adult Services: selected by **50%** of all participants

Self- Initiated Work Experience/IES: selected by **10%** of all participants

The chart below reflects the total anticipated participants in FFY 2016 by Local Workforce Development Area. Based on monthly participation reports, we anticipate 10% of SNAP Work Registrants will volunteer for a total of **13,650** Regular participants. According to CBPP and trends noticed within states that have already implemented the ABAWD time limits, a drop of at least 60% was noticed. Therefore, we are planning to serve 40% of Tennessee's anticipated ABAWD population for a total of **32,389** ABAWDs during FFY 2016.

Total Participants projected for FFY 2016 is **46,039**.

LWDA	Total # of ABAWDs	# of ABAWDs if waiver is accepted	Total Mandatory Work Regs	Anticipated Mand WR Participants	Current AJC offering SNAP E&T
LWDA 1	3750	3046	5065	507	Johnson City
LWDA 2	4828	2035	11980	1198	Talbott
LWDA 3	4599	4599	1222	122	Knoxville
LWDA 4	5732	2484	12148	1215	Crossville
LWDA 5	6786	4157	11970	1197	Chattanooga
LWDA 6	3363	2359	6753	675	Tullahoma
LWDA 7	4768	2526	4436	444	Cookeville
LWDA 8	7340	7260	12384	1238	Clarksville
LWDA 9	15373	15373	11994	1199	Nashville
LWDA 10	2441	1247	6831	681	Columbia
LWDA 11	4708	2090	6343	634	Jackson
LWDA 12	4446	662	8816	882	Dyersburg
LWDA 13	34130	33133	36557	3656	Memphis
<b>Total</b>	<b>102264</b>	<b>80971</b>	<b>136499</b>	<b>13648</b>	



## Component Participation level

ABAWD Participants:

	<b>Total Participants</b>	<b>Expected participation level per Component</b>	<b>Number of Participants per component</b>
Adult Ed	<b>32389</b>	15%	<b>4858</b>
WIOA Youth	<b>32389</b>	25%	<b>8097</b>
WIOA Adult	<b>32389</b>	50%	<b>16195</b>
Self- Initiated	<b>32389</b>	10%	<b>3239</b>

Regular E&T Participants:

	<b>Total Participants</b>	<b>Expected participation level per Component</b>	<b>Number of Participants per component</b>
Adult Ed	<b>13650</b>	15%	<b>2047</b>
WIOA Youth	<b>13650</b>	25%	<b>3413</b>
WIOA Adult	<b>13650</b>	50%	<b>6825</b>
Self- Initiated	<b>13650</b>	10%	<b>1365</b>

### Participant Reimbursement for FFY 16:

The Tennessee Legislature has allocated \$500,000 to the SNAP E&T program for 50/50 Reimbursement Funds. This amount is matched by the Federal Government for a total of **\$1,000,000 in 50/50 Participant Reimbursement funds for FFY 2015**. This allocation is justified in all 4 Component descriptions below.

**Staffing Costs for FFY 16:**

The breakdown below identifies the staffing cost to administer the SNAP E&T Program. The allocation of staff by office is identified on the staffing table of this plan (page 38). Staff time depends on the anticipated component choice. Therefore, the time staff dedicates to each Component corresponds with the anticipated participation level of each component. The allocation across all 4 Components are described below.

(average salary), (fringe benefits), (shared costs), (indirect costs 16.23%)<sup>7</sup> = \$65,000  
**\$65,000 (salary/benefits) x 28 positions = \$1,820,000 total for all E&T Salaries**

	<b>Total Salaries</b>	<b>Expected % of staff time on Component</b>	<b>Cost of staff to operate each Component in FFY 2015</b>
Adult Ed	<b>\$1,820,000</b>	15%	<b>\$273,000</b>
WIOA Youth	<b>\$1,820,000</b>	25%	<b>\$455,000</b>
WIOA Adult	<b>\$1,820,000</b>	50%	<b>\$910,000</b>
Self- Initiated	<b>\$1,820,000</b>	10%	<b>\$182,000</b>

---

<sup>7</sup> Approved In-Direct cost agreement attached as Appendix E

## **Component Costs:**

### **1. Adult Education (AE) (Non-Work Component)**

Adult Education (AE) in Tennessee is divided into a three-level instructional system AE I, AE II, and AE III focusing on reading, writing, and math skills to bring client's functional level up enabling her/him to pass a general education development test (GED) and compete in the labor market.

- AE I serve all adults with proficiency levels in reading, writing, and numeric skills below sixth grade.
- AE II serves all adults with sixth to ninth grade proficiency levels in reading, writing, and numeric skills.
- AE III services all adults with tenth through twelfth grade proficiency levels in reading, writing, and numeric skills. GED curricular and GED preparation classes will be taught in AE III.
- English as a Second language (ESL) is also taught in some areas as needed.

A new alternative to the GED test will be offered this year. The HiSET (High School Equivalency Test) offers more accessible and more flexible test options. The HiSET test is a series of five tests covering writing, science, math, literature and the arts, and social studies. These tests require the test taker to apply reading, math, language, and critical thinking skills. Tests are taken one at a time, and can be taken in any order, as long as writing and math are not last. Passing the HiSET test series allows student to earn their High School Equivalency Diploma. ESL classes will also be covered under this Component. If there is a waiting period before the next AE Class begins, ABAWDs will be assisted with finding a work experience opportunity.

The duration of the training will be determined by the each participants test score. Programs will vary from a few weeks to several months depending on the individual need of the Participant. The targeted population is individuals lacking basic education to enable them to be competitive in labor market to obtain employment with a gainful wage to eliminate the need for public assistance. This component will be offered in all 42 counties by the Tennessee Department of Labor and Workforce Development's Adult Education Division.

### **Cost of the Component:**

#### **Participant Reimbursement 50/50 Funds:**

The AE component requires an average of 4 months of classroom instruction. Each participant is allocated a total of \$100 in the form of four (4) \$25 monthly payments for transportation costs to participate in the assigned component. The cost for each participant to take the HiSET will be covered by the AE partnership. The following totals reflect the overall 50/50 cost of the AE Component.

**6905 participants x \$100 (transportation costs) = \$690,500 + \$39,650 = \$730,150**

Monthly bus passes will be purchased in the amount of **\$39,650** for individuals that need more than the \$25 monthly payment.

**Administrative Costs 100% Funds:**

TDLWD will monitor attendance on a monthly basis by requiring the participant to have a signed attendance form completed by the instructor. TDLWD will update VOS monthly. We project a need for 28 staff positions to fully operate the program in all 42 counties and manage the anticipated 6905 participants. The allocation of staff by county is identified on the staffing table of this plan. Staff will dedicate 15% of their time on this component.

**\$1,820,000 staff salaries x 15% staff time = \$273,000 component cost**

- a. Anticipated number of participants who will enter AE: 6905
- b. Anticipated number of participants to receive transportation: 6905
- c. Per participant cost of reimbursement: \$105.74
- d. Cost of component per participant, before travel reimbursement: \$ 39.54
- e. Total Cost per participant: \$ 145.28
- f. Total annual cost of AE
  - i. Excluding travel reimbursement: \$ 273,000
  - ii. Including travel reimbursement: \$ 1,003,150

## **2. Workforce Innovation and Opportunity Act (Youth Services) Non-Work**

All SNAP E&T Participants within the WIOA youth age group will be referred to Youth services for an assessment to determine if they meet the WIOA specific eligibility standards for in-school or out-of-school youths. If eligible, Participants can receive several services far beyond what is available as a SNAP E&T Participant alone including Occupational Skills training, Paid/Unpaid work experience, Tutoring, Leadership development, and follow-up services for at least 12 months.

The duration of the training will be determined by the nature and length of the course requirements. TDLWD will select short term programs in in-demand fields that vary from a few weeks to a few months. WIOA allows up to \$4000/year tuition costs. SNAP E&T will allocate an additional \$500,000 for participants who's tuition exceeds the \$4000 yearly limit to ensure they can complete their training program. The targeted population is individuals in need of a marketable skill or education to enable them to be competitive in the labor market. Upon completion of the component, TDLWD will request OJT, internships, or job placement assistance from WIOA staff. This component will be offered in all 42 counties.

### **Cost of the Component:**

#### **Participant Reimbursement 50/50 Funds:**

WIOA will cover all supportive services for Participants that are referred from the SNAP E&T Program.

#### **Administrative Costs 100% Funds:**

TDLWD and the College case managers will monitor attendance and academic progress on a monthly basis by requiring the participant to have a signed attendance form completed by the instructor. TDLWD will update VOS monthly. We project a need for 28 staff positions to fully operate the program in all 42 counties and manage the anticipated 11510 participants. The allocation of staff by county is identified on the staffing table of this plan. Staff will dedicate 25% of their time on this component.

**\$1,820,000 staff salaries x 25% staff time = \$455,000 component cost**

**\$500,000 training/tuition costs will be reserved for trainings that exceed the WIOA \$4000 annual allowable amount.**

**\$455,000 + \$500,000 tuition allowance = \$955,000**

- g. Anticipated number of participants who will enter WIOA Youth Services: 11,510
- h. Anticipated number of participants to receive transportation: 0
- i. Per participant cost of reimbursement: \$0
- j. Cost of component per participant, before travel reimbursement: \$ 82.97
- k. Total Cost per participant: \$ 82.97
- l. Total annual cost of WIOA
  - iii. Excluding travel reimbursement: \$ 955,000
  - iv. Including travel reimbursement: \$ 955,000

### **3. Workforce Innovation and Opportunity Act (Adult/ Dislocated Worker)**

#### **Non-work**

All SNAP E&T Adult and Dislocated workers will be referred to WIOA Staff for an assessment to determine if they meet the WIOA specific eligibility standards for training. If eligible, Participants can receive several services far beyond what is available as a SNAP E&T Participant alone including Occupational Skills training, Paid/Unpaid work experience, On the Job training, and Subsidized Employment Opportunities.

The duration of the training will be determined by the nature and length of the course requirements. TDLWD will select short term programs in in-demand fields that vary from a few weeks to several months. WIOA allows up to \$4000/year tuition costs. SNAP E&T will allocate an additional \$500,000 for participants who's tuition exceeds the \$4000 yearly limit to ensure they can complete their training program. The targeted population is individuals in need of a marketable skill or education to enable them to be competitive in the labor market. Upon completion of the component, TDLWD will request OJT or job placement assistance from WIOA staff. This component will be offered in all 42 counties.

#### **Cost of the Component:**

##### **Participant Reimbursement 50/50 Funds:**

WIOA will cover all supportive services that are referred from the SNAP E&T Program.

##### **Administrative Costs 100% Funds:**

SNAP E&T Staff and WIOA staff will co-enroll Participants and case manage them together. Attendance and academic progress will be monitored on a monthly basis by requiring the participant to have a signed attendance form completed by the instructor. TDLWD will update VOS monthly. We project a need for 28 staff positions to fully operate the program in all 42 counties and manage the anticipated 23020 participants. The allocation of staff by county is identified on the staffing table of this plan. Staff will dedicate 50% of their time on this component.

**\$1,820,000 staff salaries x 50% staff time = \$910,000 component cost**

**\$500,000 training/tuition costs will be reserved for trainings that exceed the WIOA allowable amount.**

**\$910,000 + \$500,000 tuition assistance = \$1,410,000**

- m. Anticipated number of participants who will enter WIOA Adults: 23,020
- n. Anticipated number of participants to receive transportation: 23,020
- o. Per participant cost of reimbursement: \$0
- p. Cost of component per participant, before travel reimbursement: \$ 61.25
- q. Total Cost per participant: \$ 61.25
- r. Total annual cost of WIOA
  - v. Excluding travel reimbursement: \$ 1,410,000
  - vi. Including travel reimbursement: \$ 1,410,000

#### **4. Self- Initiated Work Experience/IES (Work Component)**

Work Experience Participants will be required to finding their own Work Experience assignment. The location must have a bona-fide employment opportunity or lead to the employability of an individual. If the assignment is solely to gain experience, an additional 5 hours must be spent searching for employment on Jobs4tn.com or in person to meet their required hours based on their monthly allotment. Each Participant must provide a timesheet, work search form, or show sufficient activity in their Jobs4tn.com account. Participants will be responsible for racking this information. We believe this component will encourage Participants to report their employment back to TDLWD Career Center staff. It will also allow us to request more detailed wage information and better track the success of the program.

#### **Cost of the Component:**

##### **Participant Reimbursement 50/50 Funds:**

4604 participants are expected to participate in Work experience. Transportation reimbursement will depend on the individual assignment. Each Participant's goal will be to obtain a commitment/job offer from the employer with 60 days.

$$4604 \text{ participants} \times \$50 \text{ transportation costs} = \$230,200 + \$39,650 = \$269,850$$

Monthly bus passes will be purchased in the amount of \$39,650 for individuals that need more than the \$25 payment.

##### **Administrative Costs 100% Funds:**

SNAP staff will utilize 10% of their time assisting the Participant track their participation, and authorize participant reimbursements. Participants are required to provide their timesheets and verification of job search activities.

$$\$1,820,000 \text{ staff salaries} \times 10\% \text{ staff time} = \$182,000 \text{ component cost}$$

- s. Anticipated number of participants who will enter Self-Initiated Work Experience: 4604
- t. Anticipated number of participants to receive transportation: 4604
- u. Per participant cost of reimbursement: \$ 58.61
- v. Cost of component per participant, before travel reimbursement: \$ 39.53
- w. Total cost per Participant: \$ 98.14
- x. Total annual cost of Self-Initiated Work Experience:
  - i. Excluding travel reimbursement: \$ 182,000
  - ii. Including travel reimbursement: \$ 451,850



**Total Program Costs:****Allocation to Components:**

<i>Component</i>	<i>100% Costs</i>	<i>50/50 Costs</i>	<i>Total</i>
Adult Ed	\$273,000	\$730,150	\$1,003,150
WIOA Youth	\$955,000	\$0	\$955,000
WIOA Adult	\$1,410,000	\$0	\$1,410,000
Self-Initiated Work Experience	\$182,000	\$269,850	\$451,850
<b>Total</b>	<b>\$2,820,000</b>	<b>\$1,000,000</b>	<b>\$3,820,000</b>

**Total 50/50 = \$1,000,000****Additional Administrative Allocation of 100% Funds: \$297,689**

a. Funds will be allocated for 2 staff members to conduct at least 2 site visits for technical assistance and program monitoring at all 13 offices annually.	<b>\$25,000</b>
b. Funds will be allocated for 2 staff members to attend the annual Employment and Training Conference by SERO. <b>\$750 x 2 staff =</b>	<b>\$1,500</b>
c. Annual training for all SNAP E&T staff will be during the summer. Staff will travel to Nashville for a 2 ½ day time period when we will complete in-depth systems, policy, and procedural training. <b>\$25,000 has been allocated to cover lodging, mileage, meals/incidentals, and training supplies for all 28 SNAP E&amp;T staff and guests.</b>	<b>\$25,000</b>
d. WIOA 1.5% partner costs	<b>\$46,765</b>
e. Seed Funds for CBO or College We will set aside funds to refer Participants to a potential partner while a Third Party Partnership is developed and a MOU is established.	<b>\$20,000</b>
f. Staff Travel Current staff will need to become mobile to serve the SNAP E&T Participants in surrounding counties within their LWDA. This is an estimated projection as staff has never traveled on a regular basis. Travel costs will be allocated and closely monitored for each Career Specialist in a 13 LWDA's.	<b>179,424</b>
<b>Subtotal</b>	<b>\$297,689</b>
<b>Total 100% Funds plus Component Costs<sup>8</sup></b>	<b>\$3,117,689</b>

<sup>8</sup> See components chart on page 16 for itemized cost breakdown.

## PROGRAM PARTICIPATION

- Tennessee's E&T program is designed to help SNAP households gain skills, training, work, or experience that will increase self-sufficiency. The Department of Human Services determines a SNAP applicant's eligibility status for benefits and then determines if the client is subject to work requirements. All SNAP eligible clients are reviewed to determine if they must be work registered. If the client doesn't meet any federal exemptions, then state exemptions are reviewed. If the client doesn't meet any exemptions they are eligible to participate in the SNAP E&T Program. Tennessee will offer a volunteer program in the 42 counties identified previously in this plan;
- TDLWD has developed a brochure card to provide program information and TDLWD staff contact information.
- Clients will be offered an opportunity to participate in a qualifying program component, which will ensure the continuation of their SNAP eligibility, as long as the participation requirements are met. ABAWD E&T clients who fail to report for their first or subsequent appointments will be reported to TDHS.
- When an ABAWD Participant fails to comply with work requirement, TDHS caseworker must contact the household and determine whether the month should be countable.
- When an ABAWD individual does not have good cause and fails to cooperate with the SNAP work requirements, he/she should have a countable month added to their 3 in 36 time limit.
- TDHS will send a new referral if an ABAWD who has used all of other their countable month's regains eligibility and request to be referred. TDLWD will schedule another appointment for the participant and notify TDHS if they attend or fail to comply again.
- The policy for "Up-Front Transportation Funds" was implemented in the latter part of FFY 2002. Bus passes are offered in advance of Participation or \$25 reimbursement funds for transportation is issued when proof of participation is provided. The department maintains these practices for participants that respond to offers and enter education, job training or a job search component.
- Public Transportation will be emphasized as a means to overcome the "no transportation" barrier consistently cited by SNAP E&T customers. Transportation will be coordinated with the component that the participant enters. "Up-Front Public Transportation" is intended to improve retention in components and reduce absenteeism.

"Up-Front Public Transportation" can be issued on the spot by program staff, whereas the Reimbursement Transportation Expense" requires a check to be issued and sent by mail to the participant. SNAP E&T Program staff in metropolitan areas will purchase several books of bus passes and issue as needed to clients.

Local SNAP E&T Program projects request from TDLWD Fiscal Services a check payable to the transportation agency in their city. The request has the SNAP E&T program Project Code to ensure proper charging to the SNAP E&T Program under "client public transportation."

Local offices keep a log of bus passes issued, the amount, date, client's name, and Social Security Number. Bus passes on hand, plus bus passes issued, must equal bus passes ordered and purchased. This will be checked when offices are monitored.

### **Regular Voluntary Population**

The SNAP E&T Program will serve all-regular voluntary clients in the following 42 of Tennessee's 95 counties.

Johnson	Anderson	Coffee	Putnam	Sumner	Hickman
Sullivan	Blount	Franklin	Smith	Williamson	Marshall
Washington	Cumberland	Lincoln	Cheatham	Davidson	Maury
Hamblen	Loudon	Moore	Dickson	Rutherford	Chester
Hawkins	Bradley	Warren	Humphreys	Trousdale	Madison
Sevier	Hamilton	Cannon	Montgomery	Wilson	Dyer
Knox	Sequatchie	Macon	Robertson	Giles	Shelby

## PART II

### PROGRAM PARTICIPATION AND EXEMPTIONS

TDHS Family Assistance caseworkers determine if an individual is subject to the Supplemental Nutrition Assistance Program (SNAP) Work Registration requirements. A series of codes are available to document if the participant meet any exemption criteria. The eligibility determination system calculates the unduplicated count of work registrants for federal reporting purposes. TDHS continues to ensure this report is accurate.

The number of participants who are subject to the ABAWD work requirement are tabulated by the eligibility determination system and produced on a monthly report.

Tennessee was identified by FNS as eligible for an ABAWD waiver extension through December 2015. Therefore, individuals will be referred to TDLWD and served in the 13 counties specified in this plan as Voluntary participants from the beginning of the Fiscal year until the waiver.

#### **A. Work Registrant Population**

##### **1. Number of Work Registrants (as determined by TDHS)**

- a. The number of Work Registrants expected to be in the state as of October 1, 2015 is **283,951**
- b. The number of new Work Registrants to be added between October 1, 2015, and September 30, 2016 is **51,875**
- c. The total number of Work Registrants in the state between October 1, 2015, and September 30, 2016 is **335,826**

##### **2. Unduplicated Work Registrant Count**

The TDHS eligibility determination system calculates an unduplicated Work Registrant count. The original referral date for each client is maintained in the system by the clients social security number, ensuring there will be no duplicative count of Work Registrants in the same FFY. If SNAP benefits are terminated and re-approved within the same FFY, TDHS' system will not count the participant again.

##### **3. Characteristics of Work Registrants**

The following characteristics are derived from the eligibility determination system data base:

Under 18	2% of the population
Between 18 and 59	58% of the population
Employed	12% of the population
Unemployed	88% of the population
Male	51% of the population
Female	49% of the population

*\*Demographic information provided by TDHS*

## **B. Exemption Policy**

In addition to the Federal Exemptions, found in 7 CFR 273.7 (b) eligibility staff will screen potential work registrants for the following state E&T exemptions:

- Temporary illness or injury — an illness or injury of the individual that is temporary in nature and is obvious or verified; (obvious but unverified use state code 24, verified use federal code 20 in ACCENT)
- Temporary disability — disability is temporary in nature and is obvious or verified; (if verified disability use federal code 07, if obvious but unverified use state code 24 in ACCENT)
- Temporary emergency — may be a family emergency, such as illness or disaster, or an emergency related to the job; (Code 25 in ACCENT)
- On call-back to job — such as a temporary layoff or plant shutdown for vacation; (Code 26 in ACCENT)
- No access to transportation — the individual does not have a reliable vehicle, there is no public transportation available, or the individual does not have the resources to use public transportation or to buy gas; (Code 27 in ACCENT)
- Homeless, without a fixed residence; (Code 31 in ACCENT) or
- Non-funded E&T county or other exemption approved by State Office. (Code 31 in ACCENT)

The TDHS Eligibility Counselors will have the authority to grant individual exemptions based on information received from interview with the SNAP participant and /or information received from TDLWD. (State exemptions DHS has authority). Individual exemptions shall be evaluated at the participant's next recertification unless the client reports a change that requires the worker to make a re-determination.

## **C. Work Registrants Exempt from SNAP E&T Individual / Personal Exemptions**

See table 1.

## **D. Planned E&T Program Participation**

See both Tables 1 and 2.

## **E. ABAWD Information**

The State of Tennessee was approved for a waiver of ABAWD time limits through December 31, 2015.

The anticipated number of ABAWDs in the state during the fiscal year 2016 will be 102,264.

## **PART III**

### **PROGRAM COORDINATION**

#### **A. Program Coordination**

The SNAP E&T Program is an integral part of the SNAP Program and the state's automated eligibility system. TDHS Family Assistance case managers are responsible for determining work registration and work participation requirements on each individual in a household. The ACCENT systems has a work participation screen (AEIWP), which is used to document work registration, exemption codes, appropriate dates, etc. A separate screen (AEIIT) is used to document ABAWD work participations exemptions, participation, and cooperation.

##### **1. Narrative Coordination Statements**

TDLWD SNAP E&T Central office staff meets with TDHS SNAP Policy staff throughout the year. Issues and mutual concerns are discussed and resolved. Coordination of future on-site reviews are planned and discussed. Suggestions are offered for program improvement from both agencies. The meetings result in a better understanding of problems encountered by each agency. The outcome is that partner agencies pull together for the success of the program and the customers gain.

##### **Program Reviews:**

The Grants and Program Manager will monitor programs on an annual basis. TDLWD SNAP Program staff are interviewed at the local office to determine their general understanding of the program. At each location, case files are reviewed. The Individual Employability Plan (IEP) is evaluated for detailed direction, and incremental steps to achieve program goals. The EDP documents each step as the client progresses through the program.

Program strengths are noted during reviews and recommendations are made to correct any weaknesses, opportunities to improve, or assure timeliness of the delivery of services.

The TDLWD is the administrator of the SNAP E&T Program and is the primary Service provider of E&T services.

##### **2. Information Coordination**

###### **A. Coordination of Duties between Departments**

###### **Tennessee Department of Human Services**

- Intakes, Applications, and Recertification of case
- Registration for work, all non-exempt household members (non-ABAWD)
- Update addresses and phone numbers on ACCENT.
- Notify TDLWD when a client has been deregistered.
- Coordinate and cooperate with local TDLWD staff.
- Each agency will complete systems training with each other's staff



### **Tennessee Department of Labor and Workforce Development**

- Complete and enter E&T Referrals.
- Invite participants with an offer of services.
- Discuss employment rights and options and responsibilities under the program
- Provide basic overview, assess individual job readiness, and develop an individual Employment Plan.
- Direct individual into appropriate activity with specific offer of referral to a component or job.
- Monitor and report component compliance or noncompliance to TDHS
- Authorize reimbursements
- Notify participant of date and time to conduct follow-up interviews.
- TDLWD staff will authorize reimbursement entitlements, replace lost or stolen reimbursement checks, and monitor maximum payments to the participants.
- Complete documents and enter system within five working days of action for component placement, any change that has occurred, or component completion.
- Provide all case management throughout a Participants engagement in an E&T Component and seek follow-up to capture Outcome data.

### **3. Coordination Time Frames**

The following coordination time frames will be followed, unless unforeseen circumstances prevent them from occurring:

- Once a referral list is provided by TDHS, TDLWD will send an appointment letter within 7-10 working days.
- TDLWD will schedule Orientation within 1- 2 weeks of the referral date to allow sufficient time for the Participant to enroll in a component and limit the possibility of an incurring countable month.
- TDLWD will immediately enter and electronically transmit the data required to authorize the Participant Expense Reimbursement.
- TDLWD will enter computer documents within four working days of action and re-enter rejected documents within four working days.
- TDLWD will notify TDHS within five days of any information that may affect SNAP eligibility, obtaining a job, changes in income, etc.

## **B. Interagency Coordination**

The SNAP E&T Program coordinates with different agencies to provide services to SNAP E&T participants and is as follows:

### **1. Areas of Coordination**

The SNAP E&T Program have linkages with the following:

- TDLWD is the administrative agency for SNAP E&T services
- Board of Education – TDLWD arranges Adult Education classes for SNAP E&T participants. These classes are usually conducted by local education agencies, but may be contracted to community colleges and others.
- Vocational Rehabilitation Services – Rehabilitation Services is a division of TDHS and regular referrals are made to this program when the case manager of TDLWD staff feels the individual could benefit from the services of this program. An exemption is also requested on behalf of the participant as they would not be mentally fit for employment.
- Social Services Agencies – Referrals are made to domestic violence, mental health, and substance abuse agencies when deemed appropriate by either the case manager of the TDLWD staff. Other referrals are made as appropriate to health departments, the Department of Children's Services, etc. An exemption could also be requested on behalf of the Participant as they may not be fit for employment.
- Local Area Staff – TDLWD has a strong working relationship with all 13 Local Workforce Investment Areas (LWDAs) in Tennessee.

### **2. Methods of Coordination**

The methods of coordination between SNAP E&T and the above mentioned entities include interagency non-financial verbal agreements, contracts for services, formal referral processes, joint training and staff development, co-location of staff, service from One-Stop Career Centers, etc.

## **C. Contractual Agreements**

TDLWD currently does not have any contractual agreements at this time. TDLWD plans to meet with Employers and/or Educational Institutions to establish 50/50 partnerships for FFY 2016.

## **PART IV**

### **PROGRAM TDLWD COSTS AND FINANCIAL MANAGEMENT**

#### **A. Planned Costs of the State SNAP E&T Program**

See Table 5, Planned Fiscal Year Costs

##### **1. Operating Budget**

See table 4

##### **2. Sources of SNAP E&T Funds**

The source of the matching \$500,000 is included in TDLWD's approved annual budget proposal. TDLWD's basic 100% federal fund allocation is \$3,117,689 for FFY 2016.

##### **3. Justification of Education Costs**

Any SNAP E&T funds spent on education will be over and above those allotted to the state by the U.S. Department of Education or the State Legislature for SNAP E&T Participants. Funds will only be used to increase available spaces, increase hours when the current program fails to meet the needs of the SNAP E&T participants (i.e., does not meet for 20 hours per week), and cover the costs that exceed the availability of funds from other programs.

#### **B. Contracts**

TDLWD currently does not have any contractual agreements at this time. TDLWD will enter into a contractual agreement with Employers and/or Educational Institutions to establish 50/50 Partnerships during the FFY 2016.

#### **C. Participant Reimbursement**

SNAP E&T funds in the amount of \$1,000,000 have been designated by TDLWD for Participation Expense Reimbursement, Uniforms/Supplies, and General Education Development (GED) test fees. The Tennessee State Legislature has appropriated \$500,000 to match \$500,000 federal funds to provide these supportive services to participants.

##### **1. Method of Reimbursement**

TDLWD will reimburse participants based on the methods explained above for each designated component. Participants who engage in a component will be eligible for Participation Expense Reimbursement, and/or payment to a vendor for component associated fees and supplies.

##### **2. Procedure for Reimbursement**

Payment periods will continue to be once per month. Payment will only be authorized after attendance and participation has been verified.

#### **D. Cost Allocation**

SNAP E&T is operated as a standalone program. There is no cost allocation. All costs involved in the SNAP E&T program will be paid by TDLWD.

## **PART V**

### **PROGRAM REPORTING AND MANAGEMENT INFORMATION**

#### **A. Method for Obtaining Initial Count of Work Registrants**

The INFOPAC Report from the TDHS ACCENT (Automated Client Certification and Eligibility Network for Tennessee) system collects data and provides reports on the number of work registrants and exemptions in funded counties, and number of work registrants in the non –funded counties. This computerized data is intended to be used to produce the number of SNAP Work registrants to enter on lines 1 and 2 of the FNS-583.

#### **B. Method for Ensuring an Unduplicated Work Registrant Count**

The TDHS Family Assistance computer system, ACCENT, eliminates SNAP E&T participants being registered or reported as work registrants more than once during a 12-month period.

#### **C. Methods for Meeting On-Going Federal Reporting Requirements**

##### **1. Management Information Systems (MIS) Method**

###### **a. Type of MIS**

1. The ACCENT system captures all SNAP E&T work program data handled by the Eligibility Counselors.
2. TDLWD's Virtual One Stop (VOS) system includes Adult Education, Title I, and Job Service. The SNAP process is a part of Job Service.

###### **b. Local Reporting Requirements**

1. Local TDLWD offices are required to submit monthly reports to the central office which include the following information: the number of Referrals, the number of Did Not Report, the number of Returned to TDHS, and the number of Appraised.
2. On the local level, staff input data currently into VOS to record all participant activity, which includes referral and entry into program components, referrals to jobs, and employments. This system has replaced that manual system used by staff in prior years.

## **2. Organizational Responsibility for SNAP E&T Reporting**

Expenditures to the SNAP Program consist of salaries, benefits, non-personal services (see listing below), and indirect cost. Expenditures are either 100% federally funded or 50% federally funded. The 50% federally funded expenditures are Client Expenditures for testing, supplies, and transportation payments for individuals receiving training in the SNAP E&T Program.

### **a. Responsibility for Non-Financial SNAP E&T Reporting**

Loleetha Gilbert., Grants Program Manager  
Tennessee Department of Labor and Workforce Development  
220 French Landing Drive  
Nashville, TN 37243  
Telephone: 615-253-5869  
Fax: 615-741-6106

### **b. Responsibilities for Financial SNAP E&T Reporting**

Mike Williams, Fiscal Service Accounting Manager  
Department of Labor and Workforce Development  
220 French Landing Drive  
Nashville, TN 37243  
Telephone: (615) 770- 1146

## **SNAP EXPENDITURES AND COST ALLOCATION**

Salaries charged to the SNAP E&T Program are computed by time charges in Edison (a program that captures time SNAP staff work with SNAP eligible clients) for each individual who codes time to the SNAP E&T Program multiplied by their hourly rate. Each month annual leave, sick leave, and any other types of leave are allocated to all programs within each cost center, based on the percentage of salaries for each program, to the total for that cost center. Benefits are allocated to the programs using the same process as leave. Fringe benefits are calculated at 38.91% of wages including: FICA, Retirement, and Health Insurance.

We use the PeopleSoft Enterprise software system named Edison for time charges, payments, journals and all accounting, which accumulates our monthly, quarterly and year-to-date expenditures. Reports are generated from queries ran in Edison. Non-personal expenditure categories include the following costs: supplies, communications, travel, equipment rent, equipment expense, premises rent, premises expense, services, and other.

All non-personal expenditures are directly charged to individual programs when applicable. Any non-personal expenditure's not directly charged are allocated to the programs through the Edison allocation process. The percentage allocated is based on the position percentage for each program to the total for each cost center. Charges to all of our programs are calculated in the same manner. The percentage is calculated each month based on the time charges for the month.

# TABLES



**Staffing Table:**

Location	Title	Staff Name	FTE %
<b>Nashville Offices</b>	Workforce Administrator	Deniece Thomas	0.3
	Workforce Services Director	Jaylene Younge	0.1
	Program Manager	Loleetha Gilbert	1
	Administrative Services Asst	Shavonne Menesse	1
	IT Analyst	Sonya Brown	0.5
			2.9
	SNAP Manager	Paul Hines	0.5
	Career Specialist	Bonita Dailey	1
	Career Specialist	April Smith	1
	Career Specialist	Shameka Queary	1
	Career Specialist	Mayra Marquez-Rios	1
			4.5
<b>Clarksville</b>	Career Specialist	Doris Hinton	1
	Career Specialist	Ashley Ligon	1
			2
<b>Memphis</b>	Career Specialist	Jakayla Dickson	1
	Career Specialist	Kalisa Kimble	1
	Career Specialist	Kelly Lee	1
	Career Specialist	Myletta Moore	1
			4.0
<b>Jackson</b>	Career Specialist	Sharon Hall	1
	Career Specialist	Jennifer Hopper	1
			2
<b>Chattanooga</b>	SNAP Manager	Virginia Housley	0.5
	Career Specialist	Faye Cunnyngnam	1
	Career Specialist	Paula Akers	1
			2.5
<b>Knoxville</b>	Office Manager	Tim Witt	0.1
	Career Specialist	Lisa Johnson	1
	Career Specialist	Judy Smelser	1
	Career Specialist	Joyce Monroe	1
			3.1
<b>Columbia</b>	Career Specialist	Lucas Gray	1
<b>Cookeville</b>	Career Specialist	Kathryn Collins	1
<b>Crossville</b>	Career Specialist	Carrie Landenberger	1
<b>Dyersburg</b>	Career Specialist	Maria Jackson	1
<b>Johnson City</b>	Career Specialist	Pam Campbell	1
<b>Talbott</b>	Career Specialist	Ciara Hall	1
<b>Tullahoma</b>	Career Specialist	Becky Morris	1
<b>Total Staff</b>			28

**TABLE 1:**


---

**ESTIMATED PARTICIPANT LEVELS  
FISCAL YEAR 2016**

---

<b>A.</b>	Anticipated number of work registrants in the state during the fiscal Year.	<b>335,826</b>
<b>B.</b>	List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year.	
	1. Temporarily disabled	<b>1211</b>
	2. Temporary emergency	<b>445</b>
	3. On call-back from job	<b>295</b>
	4. No access to transportation	<b>126,951</b>
	5. Approved by DHS (other approved exemption)	<b>103,174</b>
	<b>TOTAL EXEMPTIONS</b>	<b>232,076</b>
<b>C.</b>	Percent of all work registrants exempt from E&T (B/A)	<b>69.10%</b>
<b>D.</b>	Number of E&T mandatory participants (A – B)	<b>103,750</b>
<b>E.</b>	Anticipated number of ABAWDs in the state during the fiscal year.	<b>102,264</b>
<b>F.</b>	Anticipated number of ABAWDs in waived areas of the state during the fiscal year.	<b>0</b>
<b>G.</b>	Anticipated number of ABAWDs to be exempted under the state's 15 percent ABAWD exemption allowance during the fiscal year.	<b>42,990</b>
<b>H.</b>	Number of at-risk ABAWDs expected in the state during the fiscal year {E – (F + G)}	<b>59,274</b>
		Entire state is waived for ABAWD

\* Information on this table was provided by TDHS' annual report.

**TABLE 2**

**<sup>1</sup>ESTIMATED E&T PLACEMENTS  
FISCAL YEAR 2016**

<b>1.</b>	Number of ABAWD applicants and recipients expected to begin a qualifying ABAWD component.	32,389 <hr/>
<b>2.</b>	Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to begin a component.	13,650 <hr/>
<b>3.</b>	Total number of applicants and recipients the State agency expects to begin a component during the fiscal year.	46,039 <hr/>

**<sup>2</sup>ESTIMATED INDIVIDUAL PARTICIPATION  
FISCAL YEAR 2016**

Number of individuals expected to participate in the E&T Program during the fiscal year	46,039 <hr/>
---	-----------------

1. Estimate the numbers that will participate in components each month and total them on line 3. This information represents a duplicate count of participants over the course of the fiscal year and corresponds to line 3 and 4 on the FNS-583, E&T Program Activity Report.

2. Estimate the unduplicated numbers of individuals who will participate during the fiscal year. This information corresponds to line 7 on the FNS-583.

**TABLE 3**

---

**SUMMARY OF INTERAGENCY COORDINATION FOR THE E&T PROGRAM IN FISCAL YEAR 2016**

<b>Areas of Coordination</b>	<b>Agencies: List all agencies Involved</b>	<b>Number of Placements Expected</b>	<b>Methods of Coordination</b>
1. Delivers an E&T component	N/A	N/A	N/A
2. The E&T program delivers a service for another agency or program	N/A	N/A	N/A
3. Joint component of the E&T program and another agency or program	N/A	N/A	N/A
4. Referral of individuals from the E&T program to another program or agency	<b>WIOA Title 1 Adult Education</b>	<b>23020</b>	Local operating partner procedures
5. Other forms of coordination (be specific)	N/A	N/A	N/A

**TABLE 4**

<p align="center"><b>OPERATING BUDGET</b> <b>Fiscal Year 2016</b></p>							
Components	<u>State Agency Costs</u>		Contractual Costs	<u>Participant Reimbursement (State plus Federal)</u>		State Agency Cost for Dependent Care Services	Total
	Salary and Benefits	Other Costs		Dependent Care	Transportation & Other Costs		
Adult Education	\$273,000	\$0	\$0	\$0	\$730,150	\$0	\$1,003,150
Workforce Innovation Opportunity Act (Youth)	\$455,000	\$500,000	\$0	\$0	\$0	\$0	\$955,000
Workforce Innovation Opportunity Act (Adult)	\$910,000	\$500,000	\$0	\$0	\$0	\$0	\$1,410,000
Self-Initiated Work Experience	\$182,000	\$0	\$0	\$0	\$269,850	\$0	\$451,850
						Total Component Costs	\$3,820,000
						Overall State Agency E&T Administration Costs	\$297,689
						Total State E&T Costs	\$ 4,117,689

TABLE 5

**PLANNED FISCAL YEAR COSTS OF THE STATE E&T PROGRAM BY CATEGORY  
OF FUNDING  
FISCAL YEAR 2016**

<b>FUNDING CATEGORY</b>	<b>Approved FFY 2014 Budget*</b>	<b>FISCAL YEAR 2015</b>
1. 100 Percent Federal E&T Grant:	\$ 2,639,882.00	\$ 3,117,689.00
2. Share of \$20 Million ABAWD Grant (if applicable)		
3. Additional E&T Administrative Expenditures		
a. 50% Federal		
b. 50% State		
4. Participant Expenses:		
a. Transportation/Other		
50% Federal	\$ 499,987.50	\$ 500,000
50% State	\$ 499,987.50	\$ 500,000
b. Dependent Care		
50% Federal		
50% State		
5. Total E&T Program Costs (1+2+3a+3b+4a+4b = 5)		
6. 100% State Agency Cost for Dependent Care Services		
<b>7. Total Planned Fiscal Year Costs (Must agree with Table 4 - Operating Budget)</b>	<b>\$ 3,639,857.00</b>	<b>\$ 4,117,689.00</b>

[illegible]

## APPENDIX B: WIOA Youth services description

### TDLWD Youth Services

---

#### Division of Workforce Services

- Workforce Innovation and Opportunity Act (WIOA)
  - WIOA Youth Program participation is assessed by specific eligibility standards and is determined for interested individuals in one of the two following categories and requirements:
    - An in-school youth (ISY) participant must be attending school, not younger than 14 or older than 21, low income, and have one or more of a list of barriers provided in WIOA section 129(a)(1)(C)(iv):
      - Basic skills deficient.
      - An English language learner.
      - An offender.
      - A homeless youth or a runaway, in foster care or has aged out of the foster care system.
      - Pregnant or parenting.
      - A youth who is an individual with a disability.
      - An individual who requires additional assistance to complete an educational program or to secure or hold employment.
    - An out-of-school youth (OSY) participant is not attending any school (as defined under State law), not younger than 16 or older than age 24 at time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and
      - One or more of the following:
        - A school dropout;
        - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters;
        - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
        - An individual who is subject to the juvenile or adult justice system;
        - A homeless individual, a runaway, an individual who is in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act, or an individual who is in an out-of-home placement;
        - An individual who is pregnant or parenting;
        - An individual with a disability;



## TDLWD Youth Services

---

- A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. (WIOA sections 3(46) and 129(a)(1)(B).)
- Youth ages 18 and older are defined as adults and are eligible for concurrent participation in both the adult and youth programs
  - Enrollment in both programs, however, is not required
- Service activities are based on the 14 program elements required under WIOA section 129(c)(2). The 14 program elements are:
  - (1) Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential;
  - (2) Alternative secondary school services, or dropout recovery services, as appropriate;
  - (3) Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
    - i. summer employment opportunities and other employment opportunities available throughout the school year;
    - ii. pre-apprenticeship programs;
    - iii. internships and job shadowing; and
    - iv. on-the-job training opportunities;
  - (4) Occupational skill training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area involved, if the Local Board determines that the programs meet the quality criteria described in WIOA sec. 123;
  - (5) Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
  - (6) Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
  - (7) Supportive services;
  - (8) Adult mentoring for a duration of at least 12 months that may occur both during and after program participation;
  - (9) Follow-up services for not less than 12 months after the completion of participation;

## TDLWD Youth Services

---

- (10) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth;
  - (11) Financial literacy education;
  - (12) Entrepreneurial skills training;
  - (13) Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
  - (14) Activities that help youth prepare for and transition to post-secondary education and training. Funds for youth services are allocated to state and local areas based on a formula distribution
- Service strategies, developed by workforce providers, prepare youth for employment and/or post-secondary education through strong linkages between need-based academic and occupational learning
  - Local communities provide youth activities and services in partnership with the American Job Center System and under the direction of Local Workforce Development Boards
  - [List of eligible providers for youth services](#)
- Department Contact(s):
    - Briana Johnson, WIA Youth Program Manager  
615.253.8860 | [Briana.Johnson@tn.gov](mailto:Briana.Johnson@tn.gov)
    - Sterling VanDerSpuy, Workforce Services Administrator  
615.532.5945 | [Sterling.VanDerSpuy@tn.gov](mailto:Sterling.VanDerSpuy@tn.gov)

CBPP Analysis report is attached. The 3 Map options are below:

A map of Tennessee showing all 95 counties. Ten counties are highlighted in dark blue, representing the 10% of counties with the highest percentage of the population aged 65 and over. These counties are: Shelby, Fayette, Hardeman, McNairy, Hardin, Wayne, Lawrence, Giles, Lincoln, and Franklin. The remaining 85 counties are shown in light blue.

### Option 1

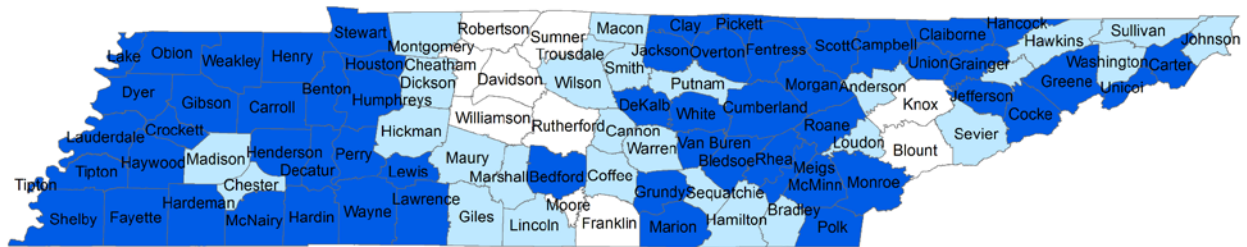
- ☐ Not Eligible with this Grouping  
☒ Eligible with Every Grouping  
☐ Eligible Based on Regional Grouping

A map of Tennessee showing all 95 counties. Ten counties are highlighted in dark blue, representing the 10% of counties with the highest percentage of the population aged 65 and over. These counties are: Shelby, Fayette, Hardeman, McNairy, Hardin, Wayne, Lawrence, Giles, Lincoln, and Franklin. The remaining 85 counties are shown in light blue.

### Option 2

- ☐ Not Eligible for a Waiver with this Grouping  
☒ Eligible with Every Grouping  
☐ Eligible with this Grouping

## 85 Counties in Tennessee Are Eligible for a 2016 Waiver in Option 3



### TN 2016 Waiver Eligibility

#### Option 3

- Not Eligible for a Waiver with this Grouping
- Eligible with Every Grouping
- Eligible with this Grouping

[illegible]

## Appendix E: Indirect cost rate

### NEGOTIATED INDIRECT COST RATE AGREEMENT STATE DEPARTMENT/AGENCY

EIN: 626001445

STATE/LOCAL DEPARTMENT/AGENCY  
TENNESSEE DEPARTMENT OF LABOR  
AND WORKFORCE DEVELOPMENT  
220 French Landing Drive  
Nashville, Tennessee 37243-0655

DATE: June 19, 2015  
FILE REF: This replaces  
the agreement dated  
January 30, 2015

The indirect cost rate(s) contained in this agreement are for use on grants and contracts with the Federal Government to which OMB Circular No. A-87 (2 CFR Part 225) apply subject to the limitations contained in the Circular and in Section II, A, below. The rate(s) were negotiated by the Tennessee Department of Labor and Workforce Development and the U. S. Department of Labor in accordance with the authority contained in Attachments C and E of the Circular.

#### SECTION I: RATES

TYPE	EFFECTIVE PERIOD		RATE *	LOCATION	APPLICABLE TO
	FROM	TO			
Final	07/01/12	06/30/13	11.13 %	All	All Programs
Final	07/01/13	06/30/14	16.23 %	All	All Programs
Provisional	07/01/14	06/30/15	16.37 %	All	All Programs
Provisional	07/01/15	06/30/16	16.23 %	All	All Programs

(See Special Remarks)

#### BASE\*:

Total direct salaries and wages including all applicable fringe benefits.

#### TREATMENT OF FRINGE BENEFITS:

Fringe benefits related to direct salaries and wages are treated as direct costs and are listed in the Special Remarks Section of this Agreement.

#### TREATMENT OF PAID ABSENCES:

Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims for the cost of these paid absences are not made.



---

## SECTION II: GENERAL

---

### A. LIMITATIONS:

Use of the rate(s) contained in this agreement is subject to any statutory or administrative limitations and is applicable to a given grant or contract only to the extent that funds are available. Acceptance of the rate(s) agreed to herein is predicated upon the conditions:

- (1) that no costs other than those incurred by the organization or allocated to the organization via an approved central service cost allocation plan were included in its indirect cost pool as finally accepted; that such incurred cost are legal obligations of the organization and are allowable under the governing cost principles;
- (2) that the same costs that have been treated as indirect costs have not been claimed as direct costs;
- (3) that similar types of costs have been accorded consistent accounting treatment; and
- (4) that the information provided by the organization used as a basis for acceptance of the rate(s) agreed to is not subsequently found to be materially incomplete or inaccurate.

The rates cited in this agreement are subject to audit.

### B. ACCOUNTING CHANGES:

The organization is required to provide written notification to the indirect cost negotiator prior to implementing any changes that could affect the applicability of the approved rates. Changes in the indirect cost recovery plan, which may result from changes such as the method of accounting or organizational structure, require the prior written approval of the Division of Cost Determination (DCD). Failure to obtain such prior written approval may result in cost disallowance.

### C. PROVISIONAL-FINAL RATES:

Provisional rates must be established within 90 days of award. The elements of indirect cost and the type of distribution base(s) used in computing provisional rates are subject to revision when final rates are negotiated.

The organization must submit a proposal to establish a final rate within six months after their fiscal year end. Billings and charges to Federal awards must be adjusted if the final rate varies from the provisional rate. If the final rate is greater than the provisional rate and there are no funds available to cover the additional indirect costs, the organization may not recover all indirect costs. Conversely, if the final rate is less than the provisional rate, the organization will be required to pay back the difference to the funding agency.

**D. USE BY OTHER FEDERAL AGENCIES:**

The rates in this agreement were approved in accordance with the authority in OMB Circular No. A-87 (2 CFR Part 225) and should be applied to grants, contracts, and other agreements covered by the CFR, subject to any limitations in Section II, A. above.

A copy of this agreement is to be provided by this organization to other Federal funding sources as a means of notifying them of the Agreement contained herein.

**E. SPECIAL REMARKS:**

1. Indirect cost rates established for a State Workforce Agency (SWA) may be used as a budgetary tool in establishing grant or contract amounts. Nevertheless, actual indirect costs charged by SWAs to Federal grants and contracts are to be determined in accordance with cost accounting procedures approved by the Division of Cost Determination.
2. Contracts/grants providing for ceilings as to the indirect cost rate(s) or amounts which are indicated in Section I above, will be subject to the ceilings stipulated in the contract or grant agreements. The ceiling rate or the actual indirect cost as described in 1 above, whichever is lower, will be used to determine the maximum allowable indirect costs on the contract or grant agreement.
3. Fringe benefits other than paid absences consist of: health insurance, contributions to a defined pension plan, FICA and longevity. The Department of Labor and Workforce Development is a reimbursing employer for unemployment insurance. The State of Tennessee is self-insured for worker's compensation. Employees are covered, but the department does not pay a percentage per employee for this coverage.
4. The indirect pool includes salaries and fringe benefits related to the following Divisions:
  - Commissioner's Office
  - Administrative & Fiscal Division
  - Information Office
  - Human Resources & Training
  - EEO
  - Information Systems Management and Internal Audit (Mixed Charges)

The pool also includes support costs such as travel, printing, utilities, communications –shipping, maintenance & repairs, professional and administrative, supplies, rental, motor vehicle operation, awards and indemnities, grants and subsidies, other, equipment, buildings, employee training, computer and professional services. Employee terminal leave is included as salaries.



ACCEPTANCE

**BY THE STATE/LOCAL DEPT/AGENCY:**

**TENNESSEE DEPARTMENT OF LABOR  
AND WORKFORCE DEVELOPMENT**

220 French Landing Drive  
Nashville, Tennessee 37243-0655

\_\_\_\_\_  
(State/Local Department/Agency)

\_\_\_\_\_  
(Signature)

Burns P. Phillips III

\_\_\_\_\_  
(Name)

Commissioner

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

**BY THE COGNIZANT AGENCY  
ON BEHALF OF THE  
FEDERAL GOVERNMENT:**

**U.S. DEPARTMENT OF LABOR**

Division of Cost Determination, Room S-1510  
200 Constitution Avenue, NW  
Washington, D.C. 20210

\_\_\_\_\_  
(Government Agency)

\_\_\_\_\_  
(Signature)

Victor M. Lopez

\_\_\_\_\_  
(Name)

Chief, Division of Cost Determination

\_\_\_\_\_  
(Title)

June 19, 2015

\_\_\_\_\_  
(Date)

DOL Representative: Margie Merced  
Telephone No: (202) 693-4104